

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

APR 11 2025

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**RANDALL MARTINEZ, JR.,**

Defendant.

Criminal No. *25-752 KWR*

Count 1: 18 U.S.C. §§ 1153 and  
2244(b): Abusive Sexual Contact.

I N F O R M A T I O N


The United States Attorney charges:

Count 1

Between on or about April 1, 2016 and on or about May 31, 2016, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **RANDALL MARTINEZ JR.**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe, a child who had not then attained the age of 18 years, and the sexual contact consisted of the defendant intentionally touching Jane Doe's vagina directly and through the clothing, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153 and 2244(b).

HOLLAND S. KASTRIN  
Acting United States Attorney

  
BRITTANY DUCHAUSSEE  
Assistant United States Attorney  
201 Third Street, Suite 900  
Albuquerque, New Mexico 87102  
(505) 346-7274